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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

FREE SPEECH FOUNDATION, INC., an  
Arizona Corporation, and DR. SIMONE GOLD,  
as President of FREE SPEECH FOUNDATION,  
INC.,

Plaintiff,

v.

PHILADELPHIA INDEMNITY INSURANCE  
COMPANY,

Defendant.

CASE NO.: 2:23-cv-01407-MMD-BNW

**STIPULATION AND ORDER TO EXTEND  
THE FIRST AMENDED COMPLAINT  
FILING DEADLINE  
[FIRST REQUEST]**

Plaintiffs, Free Speech Foundation, Inc. (“AFLDS”), an Arizona Corporation, and Dr. Simone Gold (“Gold” or “Dr. Gold”) (collectively, “Plaintiffs”) by and through their counsel of record, Jonathan D. Blum, Esq. of WILEY PETERSEN, and Defendant, PHILADELPHIA INDEMNITY INSURANCE COMPANY (“PIIC”), by and through its counsel of record, Amy M. Samberg, Esq. and Justin S. Hepworth, Esq. of the law firm Clyde & Co US LLP (collectively, the “Parties”) hereby stipulate to extend the deadline for Plaintiffs to file their First Amended Complaint by two (2) weeks from Thursday, July 11, 2024 to Friday, July 26, 2024.

Plaintiffs’ counsel will be traveling out of state on a family vacation with limited internet access through July 12, 2024, and Defendant’s counsel has graciously agreed to an extension. Therefore the Parties agree that, with the Court’s approval, the First Amended Complaint filing deadline shall be extended to Friday, July 26, 2024.

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This stipulated extension is for good cause, and not for improper delay.

DATED this 1<sup>st</sup> day of July, 2024.

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**CLYDE & CO US LLP**

**WILEY PETERSEN**

*/s/ Justin S. Hepworth*

*/s/ Jonathan D. Blum*

By: \_\_\_\_\_

By: \_\_\_\_\_

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*Attorneys for Defendant Philadelphia Indemnity  
Insurance Company*

*Attorneys for Plaintiffs*

**ORDER**

IT IS SO ORDERED.

  
\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

DATED: \_\_\_\_\_

7/2/2024